



April 15, 2020

Via ECF

The Honorable Robert W. Lehrburger,
United States District Court for the
Southern District of New York,
500 Pearl Street,
New York, New York 10007-1312.

Re: Chen-Oster, et al. v. Goldman, Sachs & Co., et ano.,
No. 10 Civ. 6950 (AT) (RWL) (S.D.N.Y.)

Dear Judge Lehrburger:

Pursuant to the Court's April 2, 2020 Order (ECF No. 987), the parties have conferred and jointly submit a proposed revised pretrial schedule to the Court.

Respectfully submitted,

/s/ Kelly M. Dermody

/s/ Ann-Elizabeth Ostrager

Kelly M. Dermody (*admitted pro hac vice*)
Anne B. Shaver (*admitted pro hac vice*)
Michael Levin-Gesundheit (*admitted pro hac vice*)
Michelle Lamy (*admitted pro hac vice*)
Valerie D. Comenencia Ortiz (*admitted pro hac vice*)
LIEFF CABRASER HEIMANN &
BERNSTEIN, LLP
275 Battery Street, 29th Floor
San Francisco, California 94111-3339
Telephone: (415) 956-1000
Facsimile: (415) 956-1008

Rachel Geman
250 Hudson Street, 8th Floor
New York, New York 10013-1413
Telephone: (212) 355-9500
Facsimile: (212) 355-9592

Adam T. Klein
Cara E. Greene
Melissa L. Stewart
OUTTEN & GOLDEN LLP
685 Third Avenue, 25th Floor

Robert J. Giuffra, Jr.
Sharon L. Nelles
Ann-Elizabeth Ostrager
Hilary M. Williams
Joshua S. Levy
Hannah Lonky Fackler
SULLIVAN & CROMWELL LLP
125 Broad Street
New York, New York 10004
Telephone: (212) 558-4000
Facsimile: (212) 558-3588

Amanda Flug Davidoff
Elizabeth A. Cassady
SULLIVAN & CROMWELL LLP
1700 New York Avenue, N.W. Suite 700
Washington, District of Columbia
20006-5215
Telephone: (202) 956-7500

Barbara B. Brown (*admitted pro hac vice*)
Carson H. Sullivan (*admitted pro hac vice*)
PAUL HASTINGS LLP
875 15th Street, NW
Washington, DC 20005

New York, New York 10017
Telephone: (212) 245-1000
Facsimile: (646) 509-2060

Paul W. Mollica
161 North Clark Street, Suite 4700
Chicago, Illinois 60601
Telephone: (212) 809-7010
Facsimile: (312) 809-7011

Telephone: (202) 551-1700

Patrick W. Shea
PAUL HASTINGS LLP
200 Park Avenue
New York, NY 10166
Telephone: (212) 318-6405

Attorneys for Plaintiffs

Attorneys for Defendants

The proposed annexed schedule is approved. The Court commends the parties for their cooperation.

SO ORDERED:



4/16/2020

HON. ROBERT W. LEHRBURGER
UNITED STATES MAGISTRATE JUDGE

Chen-Oster v. Goldman, Sachs & Co.
No. 10-cv-6950 (S.D.N.Y.) (Torres, J., Lehrburger, M.J.)

JOINT PROPOSED PRE-TRIAL SCHEDULE

Event	Prior Deadline(s) (ECF No. 943)	New Deadline(s)
Fact discovery completed	June 2, 2020	August 17, 2020
Opening expert reports, with Plaintiffs going first on all issues except Goldman's business necessity defense, for which Goldman will file the first report	July 15, 2020	September 29, 2020
Rebuttal expert reports	September 16, 2020	December 3, 2020
Reply expert reports	October 15, 2020	January 15, 2021 ¹
Expert depositions	Oct. 15 – Dec. 18, 2020	Jan. 15 – Mar. 19, 2021
Completion of expert discovery	Dec. 18, 2020	March 19, 2021
Opening briefs for Goldman's decert. motion, each party's summary judgment motion, and/or each party's <i>Daubert</i> motion	<i>Daubert</i> : Jan. 8, 2021 Decert.: Jan. 22, 2021 MSJ: Feb. 5, 2021	<i>Daubert</i> : Apr. 9, 2021 Decert.: Apr. 23, 2021 MSJ: May 7, 2021
Oppositions to motions	<i>Daubert</i> : March 9, 2021 Decert.: March 23, 2021 MSJ: April 6, 2021	<i>Daubert</i> : June 8, 2021 Decert.: June 22, 2021 MSJ: July 8, 2021
Replies in further support of motions	<i>Daubert</i> : April 8, 2021 Decert.: April 22, 2021 MSJ: May 6, 2021	<i>Daubert</i> : July 8, 2021 Decert.: July 22, 2021 MSJ: August 7, 2021
Pretrial order and motions in limine	30 days after resolution of all <i>Daubert</i> , summary judgment and decert. motions	30 days after resolution of all <i>Daubert</i> , summary judgment and decert. motions ²

¹ The parties agreed to expand the period for reply expert reports beyond what was initially provided for in ECF No. 943 solely to account for the winter holidays. If the schedule were to move again beyond the winter holidays, the parties further agree that the period for expert depositions would return to the approximately four weeks provided for in ECF No. 943.

² Or the next business day if the deadline falls on a weekend or a federal holiday.